

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

ANTHONY RICKETTS)	
)	
Plaintiff,)	
v.)	Civil Action No. 1:20-cv-01541
KSJ & ASSOCIATES, INC.)	
)	
Defendant)	

INITIAL DISCLOSURE PURSUANT TO FED. R. CIV. P. 26(a)(1)

Defendant KSJ & ASSOCIATES, INC. (“Defendant”, by and through its counsel, KIERNAN TREBACH LLP, pursuant to Fed. R. Civ. P. 26(a)(1), makes the following initial disclosures.

These disclosures are based on information presently known and reasonably available to Defendant and which Defendant reasonably believes it may use in support of its defenses. Continuing investigation and discovery may cause Defendant to amend these initial disclosures, by identifying other potential witnesses, documents, and by disclosing other pertinent information. Defendant reserves the right to supplement these initial disclosures.

By providing these initial disclosures, Defendant does not represent that it is identifying every document, tangible thing or witness possibly relevant to this action. These disclosures are made without Defendant, in any way, waiving or impacting its right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including but not limited to competency, privilege, relevancy and materiality, hearsay,

undue burden, confidentiality, or any other appropriate grounds. Furthermore, these disclosures are not an admission by Defendant regarding any matter.

Each and every disclosure set forth below is subject to the above qualifications and limitations.

1. Fed. R. Civ. P. 26(a)(1)(A)(i) Disclosures

Individuals likely to have discoverable factual information that Defendant may use to support its claims and/or defenses are listed as follows:

- a. **Anthony Ricketts**, Plaintiff.
- b. **Charles Lipinski**, address unknown. Communications involving or relating to Plaintiff.
- c. **Mary Debevoise**, c/o Defendant, 5203 Leesburg Pike #901, Falls Church, VA 22041, (703) 824-7802. Communications involving or relating to Plaintiff. Plaintiff's work performance or conduct. Plaintiff's termination from employment.
- d. **Rachel Jarosz**, c/o Defendant, 5203 Leesburg Pike #901, Falls Church, VA 22041, (703) 824-7802. Communications involving or relating to Plaintiff. Plaintiff's work performance or conduct.
- e. **Cristina McGee**, c/o Defendant, 5203 Leesburg Pike #901, Falls Church, VA 22041, (703) 824-7802. Communications involving or relating to Plaintiff. Plaintiff's work performance or conduct. Plaintiff's termination from employment.
- f. **JaJa Martinez**, c/o Defendant, 5203 Leesburg Pike #901, Falls Church, VA 22041, (703) 824-7802. Communications involving or relating to

Plaintiff. Plaintiff's work performance or conduct. Plaintiff's termination from employment.

- g. **Jacqueline Livingston**, c/o Defendant, 5203 Leesburg Pike #901, Falls Church, VA 22041, (703) 824-7802. Communications involving or relating to Plaintiff. Plaintiff's work performance or conduct. Plaintiff's termination from employment. Defendant's policies and execution of same.
- h. **Katherine Wrona**, c/o Defendant, 5203 Leesburg Pike #901, Falls Church, VA 22041, (703) 824-7802. Her experience with Defendant. Plaintiff's work performance or conduct.
- i. **Lisa Jarrett**.
- j. Past or present employees of Defendant who may have information regarding Plaintiff's allegations, including but not limited to those referenced in Plaintiff's Complaint in this action and/or his Charge of Discrimination filed with the U.S. Equal Employment Opportunity Commission.
- k. Plaintiff's health care providers.
- l. Plaintiff's academic institution(s) attended while he was employed with Defendant.
- m. Custodian(s) of Records and/or Designee(s) as may be necessary to authenticate any documents or things at trial.
- n. Any person(s) identified by any party in their initial disclosures or during discovery.

- o. Any person(s) identified in documents obtained or produced by any party and/or from or through third parties.
- p. Any other person or entity identified during the course of discovery and/or investigation of this matter.

2. Fed. R. Civ. P. 26(a)(1)(A)(ii) Disclosures

- a. Documents to/from and concerning Plaintiff.
- b. Defendant's employment policies and execution of same.
- c. Plaintiff's Complaint and Charge of Discrimination filed with the U.S. Equal Employment Opportunity Commission.
- d. Defendant reserves the right to rely on and use any documents, data compilations, or tangible things identified by any other party and/or obtained or produced by any party or third part(ies).

Copies of the foregoing documents are in possession of counsel for Defendant.

Defendant reserves the right to rely on and use any documents, data compilations, or tangible things identified by Plaintiff and/or obtained by Plaintiff or Defendant.

Defendant reserves the right to protect from production:

- i. Correspondence and other documents prepared in anticipation of litigation;
- ii. Internal memoranda, reports and correspondence;
- iii. Notes and correspondence of counsel;
- iv. Any other type of work product, attorney work product, attorney-client communications and documents that set forth the mental impressions, conclusions, opinions or legal theories of counsel or

other representatives concerning Plaintiff's claims and/or the litigation.

3. Fed. R. Civ. P. 26(a)(1)(A)(iii) Disclosures

Defendant has not made any claim for damages at this time. Accordingly, this disclosure is not applicable at this time.

4. Fed. R. Civ. P. 26(a)(1)(A)(iv) Disclosures

Documents responsive to this request will be made available for inspection and copying.

DATED: March 31, 2021.

Respectfully submitted,

KSJ & ASSOCIATES, INC.

By Counsel

KIERNAN TREBACH LLP

/s/ Alan S. Block

Alan S. Block #32528
1233 20th Street, N.W.
Eighth Floor
Washington, D.C. 20036
(202) 712-7000
(202) 712-7100 (Facsimile)
ablock@kiernantrebach.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Initial Disclosures was served electronically via ECF on this 31st day of March, 2021 upon:

Monique A. Miles, Esq.
Old Towne Associates, PC
216 S. Patrick Street
Alexandria, VA 22314
mmiles@oldtownassociates.com

Janice Williams-Jones, Esq.
PRO HAC VICE
Law Office of Janice Williams-Jones
545 Ellicott Mills Drive, Suite 308
Ellicott City, Maryland 21043
Lawofficeofjwjones@gmail.com

/S/ Alan S. Block

Alan S. Block